

**THE RAMEAU LAW FIRM**

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November 13, 2015

**VIA ECF**

Honorable Ramon E. Reyes  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE: Kevin Schuler v. City, et. al., 14 CV 4906 (WMK)(RER)**

Your Honor:

I represent the plaintiff in the above-captioned action. I write to provide the Court with a status update pursuant to Your Honor's November 12, 2015 order.

First of all, the parties both apologize to Your Honor for missing yesterday's status conference. Both parties had communicated in advance of the date of the conference but somehow missed or overlooked the Court's order scheduling the conference.

As for the status update, plaintiff raised some deficiencies with defendants' discovery production via letter. Defendants responded to plaintiff's letter. The parties met and conferred. Defendants have consented to allowing plaintiff to amend the complaint to add the additional defendants from the Probe Team. Plaintiff will send the draft to defendants in advance with the goal being that the plaintiff will file it by November 25<sup>th</sup>.

As for the outstanding documents, defendants have agreed to produce the following records by December 2<sup>nd</sup>:

1. Disciplinary records for the officers, including the soon to be named officers
2. Memo Book entries, or entries to reflect that there were none made for this date
3. Medical records of the officers, with only redactions made for privacy concerns

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4. The full Closing report or the missing pages 12-15
5. The audio and video files from the investigation
6. A privilege log

The parties hope to conduct the deposition of the plaintiff on or before December 1<sup>st</sup> and anticipate being able to finish conducting the depositions of the officers before the discovery end date of December 31<sup>st</sup>.

Sincerely,

A handwritten signature in black ink, appearing to read 'Afsaan Saleem', written in a cursive style.

Afsaan Saleem, Esq.

cc: ACC David Cooper